

**REMARKS**

Claims 1-5, 15 and 16 are pending in this application. By this Amendment, claims 1-5 are amended, and claims 15 and 16 are added. Support for the amendments to claims 1-5 may be found at least at paragraphs [0056]-[0070] of the specification and in Figs. 3 and 4. Support for new claims 15 and 16 may be found at least at paragraphs [0056]-[0070] of the specification and in Figs. 3 and 4. No new matter is added. In view of at least the following, reconsideration and allowance are respectfully requested.

**I. Claim Rejections under 35 U.S.C. §112**

The Office Action rejects claims 1-5 under 35 U.S.C. §112, first paragraph for failing to comply with the written description requirement; and claims 1-5 under 35 U.S.C. §112, second paragraph for indefiniteness. These rejections are respectfully traversed.

In particular, the Office Action asserts that use of "manufacture solution" is not supported by the specification and that the term is indefinite.

By this amendment, claims 1-5 have been amended to replace "manufacture solution" with "functional solution," which is clearly supported by the specification.

Accordingly, withdrawal of the rejections is respectfully requested.

**II. Claim Rejections under 35 U.S.C. §102**

The Office Action rejects claims 1-5 under 35 U.S.C. §102(b) over U.S. Patent Application Publication No. 2002/0008725 A1 (Katsuragi). This rejection is respectfully traversed.

The Office Action asserts that Katsuragi teaches each and every feature of claims 1-5. Applicants respectfully submit that Katsuragi fails to at least teach "suctioning... from the liquid droplet ejection head by the suction unit," as recited in claims 1, 2, 4 and 5.

Applicants submit that the presently claimed features express are in order in which steps are completed. Such features are not recited by the Katsuragi reference.

Furthermore, "functional solution" is defined as an ink to manufacture a device in at least paragraph [0005] of the specification. Specifically, in at least paragraphs [0005]-[0008], "functional solution" is contrasted with storage solutions, predetermined solvents, and purified water. Thus, "functional solution" could not be confused with any of these significantly distinct solutions.

For at least the above reasons, claims 1, 2, 4 and 5 are not anticipated or rendered obvious by Katsuragi.

Claim 3 depends from claim 1. Because the applied reference fails to anticipate or render obvious the features recited in independent claim 1, dependent claim 3 is patentable for at least the reasons that claim 1 is patentable, as well as for the additional features it recites.

Accordingly, withdrawal of the rejection is respectfully requested.

### **III. New Claims**

Claim 15 depends from claim 2. Because the applied reference fails to anticipate or render obvious the features recited in independent claim 2, dependent claim 15 is patentable for at least the reasons that claim 2 is patentable, as well as for the additional features it recites.

Independent claim 16 recites "[a] method of cleaning a liquid droplet ejection apparatus having a passage including a liquid droplet ejection head and a conduit to feed a functional solution to the liquid droplet ejection head, the method comprising: filling the passage with water; replacing the water with a first solvent capable of dissolving both the water and a second solvent contained in the functional solution, and suctioning the water from the liquid droplet ejection head by a suction unit; and replacing the first solvent with the second solvent contained in the functional solution, and suctioning the first solvent from the liquid droplet ejection head by the suction unit." Applicants respectfully submit that Katsuragi fails to teach such features, and thus, the claim is allowable.

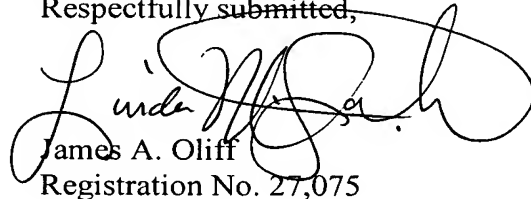
Accordingly, allowance of the claims is respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

  
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Attachment:

Request for Continued Examination

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